



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

29

JUN 28 1999

Mark A. Stevens, Esquire  
Langsam, Stevens & Morris LLP  
1616 Walnut Street  
Suite 812  
Philadelphia, PA 19103

Re: Chemcene Site Defense Group

Dear Mark:

I am pleased to forward to you a fully executed Administrative Order on Consent ("AOC") for Superfund remedial design work at the Malvern TCE Site. As I read the order, it becomes effective on the third business day following the date on which EPA forwards a true and correct copy via overnight mail (paragraph 3.1). The enclosed document is that copy; the AOC therefore becomes effective on Thursday, July 1.

EPA also has signed the Consent Decree, and has forwarded that document to the Department of Justice where it will undergo final review prior to lodging with the court.

I thank you for your efforts and work, particularly over the past several weeks, in pulling together the final details of this package, and the signatures of the parties by the requested date. I am pleased that we have reached agreement so that the work can move forward on a mutual basis.

Sincerely,

A handwritten signature in cursive script, appearing to read "Heather Gray Torres", is written over a horizontal line.

Heather Gray Torres  
Associate Regional Counsel

cc: Margaret O. Murphy, Esq., PADEP

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III**

**IN THE MATTER OF:**

**Malvern TCE Superfund Site**

**EPA Docket No.**

**III-99-018-DC**

**Respondents**

Proceeding Under Sections 106  
and 122(a) of the Comprehensive  
Environmental Response, Compen-  
sation, and Liability Act of  
1980, as amended, 42 U.S.C.  
§§ 9606 and 9622(a).

I hereby certify that the  
within is a true and correct copy  
of the original \_\_\_\_\_  
filed in this matter.

\_\_\_\_\_  
Attorney for

**ADMINISTRATIVE ORDER ON CONSENT FOR  
REMEDIAL DESIGN  
LIST OF RESPONDENTS**

Action Manufacturing Company  
Alcoa Inc. fka Aluminum Company of  
America  
Armstrong World Industries, Inc.  
Barker Pipe Fittings Co.  
Beckett Corporation  
Bulova Technologies LLC  
Cabot Corporation  
Chemetall Foote Corp.  
Delbar Products, Inc.  
Fischer & Porter Company  
General Electric Company  
General Motors Corporation  
Hamilton Precision Metals, Inc.  
Hamilton Watch Company  
Handy & Harman Tube Company  
Hercules Incorporated (for Electronic  
Display Systems, Inc. A/K/A  
Hercules Aerospace Display Systems,  
Inc. and B.F. Goodrich Aerospace

Display Systems, Inc.)  
KIM Manufacturing Company  
L-3 Communications - Aydin  
LaFrance Corp.  
Lucent Technologies Inc. for itself and on  
behalf of its predecessor AT&T  
Moore Products Co.  
Morning Call, Inc.  
NW Controls, Inc.  
Plymouth Tube Company  
Porter Instrument Company, Inc  
PP&L, Inc.  
Reilly Plating Co., Inc.  
Rex Heat Treat - Lansdale, Inc.  
Sunroc Corporation  
Syntex (U.S.A.), Inc.  
Unisys Corporation  
USG Corporation  
Vishay Intertechnology, Inc.  
VIZ Liquidation Trust

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III**

**IN THE MATTER OF:**

**Malvern TCE Superfund Site**

**EPA Docket No.**

**III-99-018-DC**

**Respondents**

Proceeding Under Sections 106  
and 122(a) of the Comprehensive  
Environmental Response, Compens-  
ation, and Liability Act of  
1980, as amended, 42 U.S.C.  
§§ 9606 and 9622(a).

**ADMINISTRATIVE ORDER ON CONSENT FOR  
REMEDIAL DESIGN**

The Parties to this Administrative Order on Consent ["Consent Order"], EPA Docket No. III-99-018-DC, ["Respondents"] and the United States Environmental Protection Agency {EPA"}, and the Commonwealth of Pennsylvania ["Commonwealth"], have agreed to the entry of this Consent Order, and the Respondents agree to undertake all actions required by this Consent Order pursuant to the terms and conditions of this Consent Order, including any attachments hereto.

**I. GENERAL PROVISIONS**

- 1.1 This Consent Order is issued pursuant to the authority vested in the President of the United States by Sections 106 and 122(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ["CERCLA"], 42 U.S.C. §§ 9606 and 9622(a); delegated to the Administrator of EPA by Executive Order No. 12580 [52 Fed. Reg. 2926 (January 29, 1987)]; and further delegated to the Regional Administrators of EPA by EPA Delegation Nos. 14-14-A and 14-14-C.
- 1.2 The Respondents consent to and will not contest EPA jurisdiction to issue and/or enforce this Consent Order.

- 1.3 On November 26, 1997, EPA issued a Record of Decision ["ROD"] selecting remedial action for implementation at the Malvern TCE Superfund Site in East Whiteland, Pennsylvania ["Site"]. All findings, conclusions and determinations supporting the legal requirements for issuance of this Consent Order under Section 106 of CERCLA, 42 U.S.C. § 9606, are set forth in the ROD. Issuance of this Consent Order is practicable and in the public interest within the meaning of Section 122(a) of CERCLA, 42 U.S.C. § 9622(a).
- 1.4 The actions required by this Consent Order are necessary to protect the public health and welfare and the environment.
- 1.5 All activities undertaken by Respondents pursuant to this Consent Order shall be performed in accordance with the requirements of all applicable Federal and State laws and regulations. Respondents must also comply with all applicable or relevant and appropriate requirements of all Federal and State environmental laws as set forth in the ROD. EPA has determined that activities conducted pursuant to this Consent Order and approved by EPA shall be considered to be consistent with the National Oil and Hazardous Substances Pollution Contingency Plan ["NCP"], 40 C.F.R. Part 300.
- 1.6 Subject to the general provisions of the Consent Decree Section V, paragraph 6, Respondents are jointly and severally responsible for carrying out all actions required by this Consent Order. In the event of the failure of one or more of the Respondents to implement the requirements of this Consent Order, the remaining Respondent(s) shall complete all such requirements.

## **II. STATEMENT OF PURPOSE**

- 2.1 In entering into this Consent Order, the common objective of EPA, the Commonwealth, and the Respondents is to expedite commencement and performance of Remedial Design, as defined in Paragraph 4, Section IV (Definitions) of the proposed consent decree appended hereto as Attachment 1 ["Consent Decree"], in accordance with the requirements of this Consent Order and the Consent Decree and to enter into an agreement that is legally binding upon all Parties until the Consent Decree is entered or in the event the Consent Decree is not entered pursuant to Paragraph 124, Section XXVIII (Effective Date) of the Consent Decree.
- 2.2 In an effort to simplify this Consent Order, the Parties have agreed that certain obligations of this Consent Order shall be expressed by reference to provisions of the Consent Decree. Each referenced provision of the Consent Decree, including each provision of the Consent Decree referenced therein, shall be incorporated herein by reference and shall be effective as if set forth in this Consent Order in its entirety.

For those provisions, and solely for purposes of this Consent Order, the following definitions apply except as otherwise provided in this Consent Order:

- (a) The term "Settling Defendants" when used in the Consent Decree shall mean Respondents;
- (b) The term "Consent Decree" when used in the Consent Decree shall mean this Consent Order;
- (c) The term "Parties" when used in the Consent Decree shall mean Respondents and EPA and the Commonwealth (if appropriate);
- (d) All references to the date of lodging or entry of the Consent Decree shall mean the effective date of this Consent Order;
- (e) All references to Section XX (Dispute Resolution) of the Consent Decree shall mean Section XV (Dispute Resolution) of this Consent Order.

2.3 Except as provided herein, all terms shall be defined in the manner set forth in Paragraph 4, Section IV (Definitions) of the Consent Decree.

### **III. EFFECTIVE DATE AND TERMINATION**

3.1 The effective date of this Consent Order shall be the third business day following the date on which EPA forwards a fully executed true and correct copy of this Consent Order to Respondents via overnight delivery.

3.2 This Consent Order shall terminate:

- (a) at the time the Consent Decree becomes effective pursuant to Section XXVIII of the Consent Decree;
- (b) at the time the Court denies the United States' petition to enter the Consent Decree; or
- (c) at the time the United States withdraws or withholds its consent from the Consent Decree because comments submitted during the public comment period established pursuant to Section 122(d)(2) of CERCLA, 42 U.S.C. § 9622(d)(2) and 28 C.F.R. § 50.7, disclose facts or considerations which indicate that the Consent Decree is inappropriate, improper, or inadequate; whichever is earlier.

- 3.3 Should this Consent Order be terminated under Section 3.2(b) or (c) above, such termination shall not affect Section X (Access), Section XX (Dispute Resolution), Section XXVI (Retention of Records) and Section XXIII (Covenants by Respondents) of this Consent Order.

#### **IV. PARTIES BOUND**

- 4.1 This Consent Order shall apply to and be binding upon EPA, the Commonwealth, and upon Respondents and their successors and assigns. Any change in ownership or corporate status of a Respondent, including, but not limited to, any transfer of assets or real or personal property, shall in no way alter Respondents' responsibilities under this Consent Order.
- 4.2 Paragraph 2, Section III (Parties Bound) of the Consent Decree is incorporated herein by reference, except that the Settling Federal Agency is not so included.

#### **V. NOTICE TO THE COMMONWEALTH**

- 5.1 Notice of issuance of this Consent Order has been given to the Commonwealth, pursuant to Section 106 of CERCLA, 42 U.S.C. § 9606(a).

#### **VI. WORK TO BE PERFORMED**

- 6.1 The following Consent Decree provisions are incorporated herein by reference:
- (a) Paragraph 5, Section V (General Provisions), including paragraph 5(iv) to provide Settling Defendants and the Settling Federal Agency with contribution protection for the actions required by this Consent Order pursuant to Section 113(f)(2) of CERCLA, 42 U.S.C. Section 9613(f)(2), and Section 705 (c)(2) of HSCA, 35 Pa. Stat. Ann. Section 6020;
  - (b) Paragraph 9, Section VI (Performance of the Work by Settling Defendants)
  - (c) Paragraph 10. a., b. and c., Section VI (Performance of the Work by Settling Defendants)

- (d) Paragraph 13, Section VI (Performance of the Work by Settling Defendants), except that modifications under such paragraph can only be required for remedial design activities.
- (e) Paragraph 14, Section VI (Performance of the Work by Settling Defendants)
- (f) Paragraph 105, Section XXII (Covenants Not to Sue by Plaintiff[s])

## **VII. QUALITY ASSURANCE**

- 7.1 Section IX (Quality Assurance, Sampling and Data Analysis) of the Consent Decree is incorporated herein by reference.

## **VIII. ACCESS**

- 8.1 Paragraphs 34 and 35, to the extent that provision pertains to acquiring access to the Site and other property for the purpose of conducting any activity relating to the Consent Decree and/or executing and recording access easements, and Paragraph 37, Section X (Access and Institutional Controls) of the Consent Decree are incorporated herein by reference.

## **IX. REPORTING REQUIREMENTS**

- 9.1 Section XI (Reporting Requirements) of the Consent Decree is incorporated herein by reference.

## **X. EPA APPROVAL OF PLANS AND OTHER SUBMISSIONS**

- 10.1 Section XII (EPA Approval of Plans and other Submissions) of the Consent Decree is incorporated herein by reference.

## **XI. PROJECT COORDINATORS**

- 11.1 Section XIII (Project Coordinators) of the Consent Decree is incorporated herein by reference.

## **XII. EMERGENCY RESPONSE**

- 12.1 Section XVI (Emergency Response) of the Consent Decree is incorporated herein by reference.

## **XIII . INDEMNIFICATION**

- 13.1 Paragraphs 71 and 72, Section XVIII (Indemnification and Insurance) of the Consent Decree are incorporated herein by reference.

## **XIV . FORCE MAJEURE**

- 14.1 Section XIX (Force Majeure) of the Consent Decree is incorporated herein by reference.

## **XV. DISPUTE RESOLUTION**

- 15.1 For purposes of this Section XV (Dispute Resolution), the term "United States" as used in Section XX (Dispute Resolution) of the Consent Decree shall mean EPA.
- 15.2 The following Consent Decree provisions are incorporated herein by reference:

- (a) Paragraph 78, Section XX (Dispute Resolution)
- (b) Paragraph 79, Section XX (Dispute Resolution)
- (c) Paragraph 80.a. and b., Section XX (Dispute Resolution)
- (d) Paragraph 80.c., Section XX (Dispute Resolution) (first sentence only)
- (e) Paragraph 81, Section XX (Dispute Resolution)
- (f) Paragraph 81.a., Section XX (Dispute Resolution)



- (g) Paragraph 81.b., Section XX (Dispute Resolution) (first sentence only)
- (h) Paragraph 81.d., Section XX (Dispute Resolution) (first sentence only)
- (i) Paragraph 82, Section XX (Dispute Resolution)
- (j) Paragraph 82.a., Section XX (Dispute Resolution). EPA's decision shall be binding on Respondents. Respondents shall bear the burden of coming forward with evidence and the burden of persuasion.
- (k) Paragraph 85, Section XX (Dispute Resolution), except that the phrase "as provided in Paragraph 94" in the second sentence shall be omitted.

#### **XVI. STIPULATED PENALTIES**

- 16.1 Paragraphs 86-93 and 95-96, Section XXI (Stipulated Penalties) of the Consent Decree are incorporated herein by reference, except that the situation referred to in subsection (iii) of Paragraph 90 shall not apply under this Consent Order.
- 16.2 Stipulated penalties shall continue to accrue during any dispute resolution period. In the event Respondents do not prevail upon resolution of a dispute, Respondents shall pay all stipulated penalties owed within thirty (30) days of receipt of EPA's decision regarding the dispute. These penalties shall include all penalties which accrued prior to and during the period of dispute. Stipulated penalties shall not be owed or collectible for the matter, or that portion of the matter, in dispute to the extent Respondents prevail.

#### **XVII. COVENANTS BY RESPONDENTS**

- 17.1 Section XXIII (Covenants by Settling Defendants) of the Consent Decree is incorporated herein by reference.

#### **XVIII. ACCESS TO INFORMATION**

- 18.1 Section XXV (Access to Information) of the Consent Decree is incorporated herein by reference.

**XIX. RETENTION OF RECORDS**

- 19.1 Section XXVI (Retention of Records) of the Consent Decree is incorporated herein by reference.

**XX. NOTICES AND SUBMISSIONS**

- 20.1 Section XXVII (Notices and Submissions) of the Consent Decree is incorporated herein by reference.

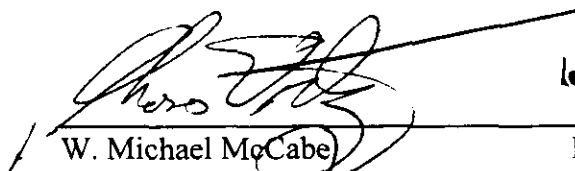
**XXI. COMMUNITY RELATIONS**

- 21.1 Section XXXI (Community Relations) of the Consent Decree is incorporated herein by reference.

**XXII. MODIFICATION**

- 22.1 Paragraph 129, Section XXXII of the Consent Decree is incorporated herein by reference.
- 22.2 No modifications shall be made to the provisions of this Consent Order without written notification to, and approval of, the Parties.
- 22.3 Modifications to the Remedial Design Work Plan may be made by mutual agreement of the EPA and Respondents' Project Coordinators. Any such modifications must be in writing and signed first by the Respondents' Project Coordinator and then by the EPA Project Coordinator. The effective date of the modification shall be the date on which the modification is signed by the EPA Project Coordinator.

**IT IS SO AGREED AND ORDERED.**

  
W. Michael McCabe  
Regional Administrator  
EPA Region III

JAN 25 1999  
Date

**FOR THE COMMONWEALTH OF PENNSYLVANIA:**

  
A handwritten signature in cursive script, appearing to read "Margaret O. Murphy", is written over a horizontal line.

MARGARET O. MURPHY

Assistant Counsel

Office of Chief Counsel

PADEP - Southeast Region

Lee Park, Suite 6015, 555 North Lane

Conshohocken, PA 19428

Date: 6/21/99


**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that he is authorized to execute this Consent Order on behalf of the Respondent for which he has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

**Action Manufacturing Company**

(Specify entity identified on EPA's Volumetric Ranking Summary)

  
**ACTION MANUFACTURING COMPANY, INC., a  
Delaware Corporation, for itself and behalf of  
its predecessors: Action Manufacturing Company,  
Inc., a Pennsylvania Corporation, AMRAM, Inc.,  
AMCOM, Inc. and Harry and Martha Stern**

June 10, 1999

**By: Arthur J. Mattia, President**

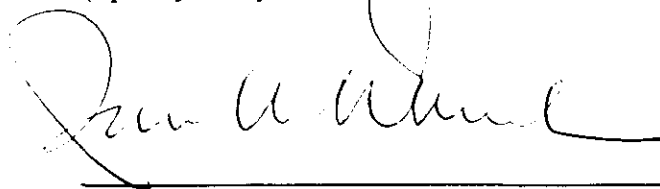
**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that [he/she] is authorized to execute this Consent Order on behalf of the Respondent for which [he/she] has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

Aluminum Company of America

(Specify entity identified on EPA's Volumetric Ranking Summary)



6.14.99

[Respondent] Ralph W. Waechter

Date

[Name] SR COUNSEL

[Title] ALCOA INC


(fka Aluminum Company of America)

**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that [he/she] is authorized to execute this Consent Order on behalf of the Respondent for which [he/she] has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

Armstrong Cork Company  
(Specify entity identified on EPA's Volumetric Ranking Summary)

  
\_\_\_\_\_  
[Respondent] Armstrong World Industries, Inc. Date June 15, 1999  
[Name] H. C. Goff  
[Title] Senior Vice President Operations, Floor Products Operations

**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that he is authorized to execute this Consent Order on behalf of the Respondent for which he has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

Aydin Corporation



**L-3 Communications Aydin Corporation**  
David Sweet  
Counsel

**June 17, 1999**

Date



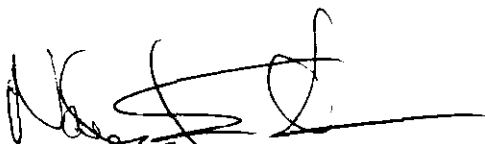
**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that [he/she] is authorized to execute this Consent Order on behalf of the Respondent for which [he/she] has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

Pentflex Inc

(Specify entity identified on EPA's Volumetric Ranking Summary)



6/17/99

[Respondent] Barker Pipe Fittings Co.

Date

[Name] Nathaniel S. Barker

[Title] Vice President

**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that **[he/she]** is authorized to execute this Consent Order on behalf of the Respondent for which **[he/she]** has signed and to bind said Respondent to the terms and conditions of this Consent Order.

Beckett Corporation, a New Jersey Corporation  
By:

Date: June 14, 1999

William Flisher C.O.O.  
William Flisher, Chief Operating Officer  
101 Commerce Drive  
Moorestown, New Jersey 08057

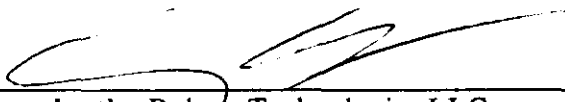
**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that **[he/she]** is authorized to execute this Consent Order on behalf of the Respondent for which **[he/she]** has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

Hamilton Technology, Inc.

(Specify entity identified on EPA's Volumetric Ranking Summary)

  
\_\_\_\_\_  
**[Respondent]** Bulova Technologies LLC  
**[Name]** Craig Schnee  
**[Title]** Vice President

6/14/99  
Date

IN THE MATTER OF:

Malvern TCE Superfund Site

EPA Docket No. III-99-018-DC

Administrative Order on Consent  
for Remedial Design

The undersigned hereby certifies that he is authorized to execute this Consent Order on behalf of the Respondent for which he has signed and to bind said Respondent to the terms and conditions of this Consent Order.

FOR: THE CABOT GROUPING  
(Kawecki Berylco, Cabot Berylco,  
Cabot, and Cabot Wrought Products)

BY

:



NAME

:

Robert Rothberg

TITLE

:

Vice President and General Counsel  
Cabot Corporation  
75 State Street  
Boston, MA 02109

DATE:

June 15, 1999

**FOR THE RESPONDENTS:**

The undersigned hereby certifies that he is authorized to execute this Consent Order on behalf of the Respondent for which he has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

Cyprus Foote Mineral Co.  
(specify Entity on EPA's Volumetric Ranking Summary)

P. J. Seaman  
Respondent: CHEMETALL FOOTE CORP.  
Name: P. J. Seaman  
Title: Vice President - Operations

6/15/99  
Date

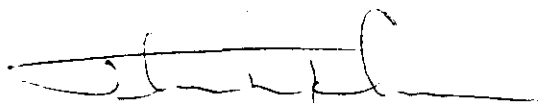
**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that [he/she] is authorized to execute this Consent Order on behalf of the Respondent for which [he/she] has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

Delbar Products, Inc.

(Specify entity identified on EPA's Volumetric Ranking Summary)



6/11/99

**[Respondent]** Delbar Products, Inc.

**Date**

**[Name]** Thomas M. Karabinos

**[Title]** President and Treasurer

In the Matter of the Malvern TCE Superfund Site  
Administrative Order on Consent For Remedial Design  
EPA Docket Number III-99-018-DC

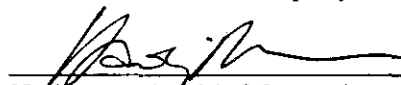
FOR THE RESPONDENTS

The undersigned certifies that he is authorized to execute this Consent Order on behalf of the Respondent for which he has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the Respondent and its subsidiaries including the following entity identified by EPA as contributing substances to the Malvern TCE Superfund Site: Fischer & Porter Co./Andrews Glass

Respondent: Fischer & Porter Company

By:


  
Hadj Amari, Chief Operating Officer,  
Fischer & Porter Company

Date:

6/14/99

**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that **[he/she]** is authorized to execute this Consent Order on behalf of the Respondent for which **[he/she]** has signed and to bind said Respondent to the terms and conditions of this Consent Order.

  
\_\_\_\_\_  
**RCA CORPORATION**  
**David W. Thompson**  
**Manager, Mid-Atlantic/Southeast Region**  
**Environmental Remediation Program**  
**General Electric Company**

6/13/99  
Date



**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that **[he/she]** is authorized to execute this Consent Order on behalf of the Respondent for which **[he/she]** has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

GENERAL MOTORS CORPORATION  
(Specify entity identified on EPA's Volumetric Ranking Summary)

Alon A. Schiemann  
[Respondent]  
[Name]  
[Title]

6/10/99  
Date

**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that [he/she] is authorized to execute this Consent Order on behalf of the Respondent for which [he/she] has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

HAMILTON PRECISION METALS, INC.  
(Specify entity identified on EPA's Volumetric Ranking Summary)

Larry D. Hanson  
[Respondent]  
[Name]  
[Title]

6/14/99  
Date

**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that [he/she] is authorized to execute this Consent Order on behalf of the Respondent for which [he/she] has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

HANDY & HARMAN Tube Company  
(Specify entity identified on EPA's Volumetric Ranking Summary)

David L. Kelly June 16, 1999  
[Respondent] Date  
[Name] DAVID L. KELLY  
[Title] DIRECTOR, CORP. E.H. & S OFFICE

**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that [he/she] is authorized to execute this Consent Order on behalf of the Respondent for which [he/she] has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

\*Electronic Display Systems, Inc.  
(Specify entity identified on EPA's Volumetric Ranking Summary)

<p>_____</p> <p>[Respondent] [Name] [Title]</p>	<p>Marshall W. Jones Acting Vice President of Safety, Health, Environment and Regulatory Affairs, Hercules Incorporated</p>	<p>_____</p> <p>Date</p>	<p>_____</p> <p>RW</p>
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\*/This corporation was subsequently renamed "Hercules Aerospace Display Systems, Inc." and "B.F. Goodrich Aerospace Display Systems, Inc."

**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that [he/she] is authorized to execute this Consent Order on behalf of the Respondent for which [he/she] has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

Kim Manufacturing Company  
(Specify entity identified on EPA's Volumetric Ranking Summary)

T. J. Kiely  
[Respondent] Kim Manufacturing Company  
[Name] Thomas J. Kiely, JR.  
[Title] President

6/14/99  
Date

**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that he is authorized to execute this Consent Order on behalf of the Respondent for which he has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

LaFrance Corporation

(Specify entity identified on EPA's Volumetric Ranking Summary)

**LaFRANCE CORPORATION**

**By:**

George F. Barrar  
**GEORGE F. BARRAR, President**

6/7/99  
**Date**

**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that [he/she] is authorized to execute this Consent Order on behalf of the Respondent for which [he/she] has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

Western Electric Company  
(Specify entity identified on EPA's Volumetric Ranking Summary)

Lucent Technologies Inc., for itself  
and on behalf of its predecessor, AT&T

*Rick Bennett* June 15, 1999  
Rick Bennett Date:  
Global Environmental, Health & Safety  
Vice President

**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that **[he/she]** is authorized to execute this Consent Order on behalf of the Respondent for which **[he/she]** has signed and to bind said Respondent to the terms and conditions of this Consent Order.

*R. E. Wisniewski*      6/16/99      \_\_\_\_\_  
[Respondent] Moore Products Co. Date  
[Name] Robert E. Wisniewski  
[Title] Secretary & Treasurer



**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that he is authorized to execute this Consent Order on behalf of the Respondent for which he has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

THE MORNING CALL, INC.

  
\_\_\_\_\_  
THE MORNING CALL, INC.  
JONATHAN BEST  
VICE PRESIDENT  
AND CHIEF FINANCIAL OFFICER

6/14/99  
Date

**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that [he/she] is authorized to execute this Consent Order on behalf of the Respondent for which [he/she] has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

NW CONTROLS, INC.  
(Specify entity identified on EPA's Volumetric Ranking Summary)

HENRY E. SHONTZ - PRESIDENT

Henry E Shontz Pres      6-14-99  
[Respondent]      Date  
[Name]      For  
[Title]

NW Controls Inc.

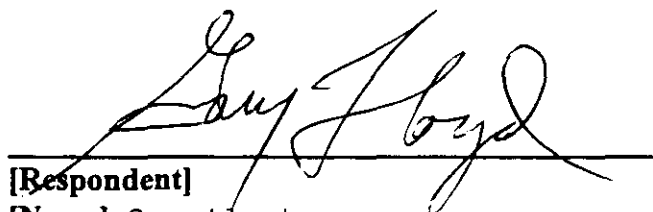
**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that [he/she] is authorized to execute this Consent Order on behalf of the Respondent for which [he/she] has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

Plymouth Tube Co.

(Specify entity identified on EPA's Volumetric Ranking Summary)

A handwritten signature in black ink, appearing to read "Gary Lloyd", is written over a horizontal line. The signature is fluid and cursive.

[Respondent]

[Name] Gary Lloyd


[Title] Executive Vice-President

June 14, 1999

Date

**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that **[he/she]** is authorized to execute this Consent Order on behalf of the Respondent for which **[he/she]** has signed and to bind said Respondent to the terms and conditions of this Consent Order.

 6/14/99 \_\_\_\_\_  
[Respondent] Date

[Name]

[Title]

Porter Instrument Company, Inc.  
Gary K. Porter  
President


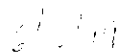
**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that [he/she] is authorized to execute this Consent Order on behalf of the Respondent for which [he/she] has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

PP&L Northern Division Service Center

(Specify entity identified on EPA's Volumetric Ranking Summary)

	
<u>[Respondent] PP&amp;L, Inc.</u>	<u>Date</u>
<u>[Name] Lynn I. Ratzell</u>	
<u>[Title] Manager-Environmental Management</u>	

11

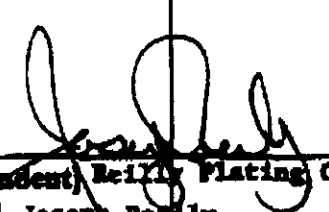
**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that [he/she] is authorized to execute this Consent Order on behalf of the Respondent for which [he/she] has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

Reilly Plating Co.

(Specify entity identified on EPA's Volumetric Ranking Summary)

  
[Respondent] Reilly Plating Company  
[Name] Joseph Reilly  
[Title] President

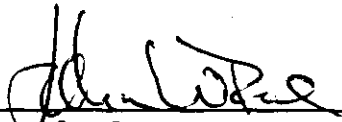
6-15-99  
Date

**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that [he/she] is authorized to execute this Consent Order on behalf of the Respondent for which [he/she] has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

J. W. Rex Company  
(Specify entity identified on EPA's Volumetric Ranking Summary)  
(Rex Heat Treat - Lansdale, Inc.)

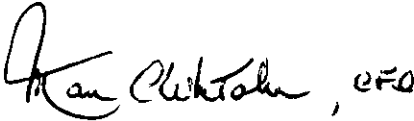
	<u>6/15/99</u>
[Respondent] J. W. Rex Company	Date
[Name] John W. Rex	
[Title] President	

**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that [he/she] is authorized to execute this Consent Order on behalf of the Respondent for which [he/she] has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

Sunroc Corporation  
(Specify entity identified on EPA's Volumetric Ranking Summary)

 , CFO

Mark C. Whitaker, Chief Financial Officer 06/15/99  
[Respondent] Date  
[Name]  
[Title]



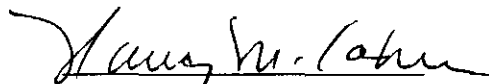
In the Matter of the Malvern TCE Superfund Site  
Administrative Order on Consent For Remedial Design  
EPA Docket Number III-99-018-DC

**FOR THE RESPONDENTS:**

The undersigned hereby certifies that she is authorized to execute this Consent Order on behalf of the Respondent for which she has signed and to bind said Respondent to the terms and conditions of this Consent Order.

Respondent: Syntex (U.S.A.) Inc.

By:



Nancy Cohen, Vice President, Legal Affairs

Date:

June 15, 1999

This corresponds to the following entities identified on EPA's November 30, 1998 Volumetric Ranking Summary as contributing substances to the Site:


Syntex Dental Products, Star Dental Corporation, and A.S. Koch Corporation

**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that [he/she] is authorized to execute this Consent Order on behalf of the Respondent for which [he/she] has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

Unisys Corporation for Burroughs Corporation  
(Specify entity identified on EPA's Volumetric Ranking Summary)

 <u>Unisys Corporation</u>	<u>6/14/99</u>
[Respondent]	Date
[Name] Gregory T. Fischer	
[Title] Vice President Facilities and Asset Management	


**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that [he/she] is authorized to execute this Consent Order on behalf of the Respondent for which [he/she] has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

**USG Grouping**

(Specify entity identified on EPA's Volumetric Ranking Summary)

x  June 9, 1999  
[Respondent] P.J. O'Bryan, President Date  
[Name] and Chief Operating Officer  
[Title] for USG Corporation

**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that [he/she] is authorized to execute this Consent Order on behalf of the Respondent for which [he/she] has signed and to bind said Respondent to the terms and conditions of this Consent Order.

This represents the following entity identified by EPA as contributing substances to the Site:

Vishay Resistive Systems

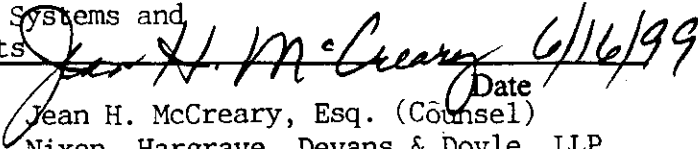
(Specify entity identified on EPA's Volumetric Ranking Summary)

Vishay Intertechnology, Inc. for itself and on behalf of  
Vishay Resistive Systems and  
Vishay Instruments

**[Respondent]**

**[Name]**

**[Title]**

 **Date** 6/16/99  
Jean H. McCreary, Esq. (Counsel)  
Nixon, Hargrave, Devans & Doyle, LLP  
P.O. Box 1051  
Rochester, New York 14603  
(716) 263-1611

**FOR THE RESPONDENTS:**

Each of the undersigned hereby certifies that [he/she] is authorized to execute this Consent Order on behalf of the Respondent for which [he/she] has signed and to bind said Respondent to the terms and conditions of this Consent Order.

V. Scott Zelov      6/15/99  
[Respondent]      Date  
[Name]  
[Title]      VIZ LIQUIDATION TRUST  
                 V. Scott Zelov  
                 Trustee